

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE FOREIGN EXCHANGE BENCHMARK RATES
ANTITRUST LITIGATION

No.13 Civ. 7789 (LGS)

**DECLARATION OF HERBERT S. WASHER IN SUPPORT OF THE CREDIT SUISSE
DEFENDANTS' MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFFS'
MOTION FOR A NEW TRIAL**

I, Herbert S. Washer, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am admitted to the bars of the State of New York and this Court. I am a partner at the law firm of Cahill Gordon & Reindel LLP, counsel for Defendants Credit Suisse Group AG, Credit Suisse AG, and Credit Suisse Securities (USA), LLC (together, "Credit Suisse") in the above-captioned matter. I make this declaration in support of the Credit Suisse Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for a New Trial.

2. Attached hereto are true and correct copies of the following:

Exhibit	Date	Description
1	10/11/2022– 10/19/2022	Excerpts from the Trial Transcripts
2	1/22/2008	PTX1373A: Excerpt of Bloomberg chat between Goldman Sachs, Credit Suisse, and RBS
3	10/28/2010	PTX1822A: Excerpt of Bloomberg chat between Credit Suisse and Standard Chartered
4	7/27/2011	PTX0070A: Excerpt of Bloomberg chat between Bank of America, Barclays, Citigroup, and Credit Suisse

5	10/9/2007	PTX0933A: Excerpt of Bloomberg chat between Credit Suisse, RBS, and UBS
6	3/3/2010	DTX318-0009: Excerpt of email chain and attachment “GFX Interview Notes”
7	7/21/2009	DTX315-0002: Excerpt of email chain and attachment “FX Strategy – Topics for Thursday call”
8	9/24/2009	DTX316-0007: Excerpt of email chain and attachment “Documents for today’s One Bank FX Core Team Meeting”
9	7/22/2011	DTX272: Email chain “FW: Bomber Spreads July 2011”
10	2007–2013	DTX2026: Demonstrative Exhibit Titled “Blackrock Spread Grids, \$100M GBP/USD, London”
11	2007–2013	DTX2028: Demonstrative Exhibit Titled “Blackrock Spread Grids, \$100M EUR/JPY, London”
12	2008–2013	DTX2011: Demonstrative Exhibit Titled “Credit Suisse U.S. FX Market Share 2008 – 2013”
13	9/15/2022	Excerpt from Sept. 15, 2022 Hal J. Singer Deposition Transcript
14	10/12/2022	Excerpt from Plaintiffs’ Updated Witness List
15	8/19/2022	Excerpt from Plaintiffs’ Proposed Special Verdict Form

Executed on: November 23, 2022
New York, New York

/s/ Herbert S. Washer
Herbert S. Washer